

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>JOHN-PATRICK M. FRITZ (SBN 245240) LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P. 2818 La Cienega Avenue Los Angeles, California 90034 Telephone: (310) 229-1234 Facsimile: (310) 229-1244 Email: JPF@LNBYB.COM;</p> <p><input type="checkbox"/> Individual appearing without an attorney <input checked="" type="checkbox"/> Attorney for: Chapter 11 Debtor and Debtor-in-Possession</p>	FOR COURT USE ONLY
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION</p>	
<p>In re: ESCADA AMERICA, LLC, Debtor and Debtor in Possession.</p> <p>Debtor(s)</p>	<p>Case No.: 2:22-bk-10266-BB Chapter 11 Case Subchapter V</p> <p>NOTICE OF LODGMENT OF ORDER IN BANKRUPTCY CASE RE: <i>(title of motion¹)</i>: STIPULATION TO EXTEND DEADLINES AND SCHEDULING REGARDING: (I) DEBTOR'S MOTION FOR ORDER: (I) AUTHORIZING USE OF CASH COLLATERAL PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE; AND (II) APPROVING ADEQUATE PROTECTION [ECF 101]; AND (II) OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY, MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS [ECF 103]</p>

PLEASE TAKE NOTE that the order **ORDER APPROVING STIPULATION TO EXTEND DEADLINES AND SCHEDULING REGARDING: (I) DEBTOR'S MOTION FOR ORDER: (I) AUTHORIZING USE OF CASH COLLATERAL PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE; AND (II) APPROVING ADEQUATE PROTECTION [ECF 101]; AND (II) OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY, MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS [ECF 103]** was lodged on (date) March 29, 2022 and is attached. This order relates to the motion, which is docket number 115.

¹ Please abbreviate if title cannot fit into text field.

Exhibit "A"

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1 JOHN-PATRICK M. FRITZ (State Bar No. 245240)
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7 Debtor and Debtor in Possession

8
9 **UNITED STATES BANKRUPTCY COURT**
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

10 In re:

11 ESCADA AMERICA LLC,

12 Debtor and Debtor in Possession.

) Case No.: 2:22-bk-10266-BB

)

) Chapter 11 Case

) Subchapter V

)

) **ORDER APPROVING STIPULATION**
13) **TO EXTEND DEADLINES AND**
14) **SCHEDULING REGARDING:**

)

)

) **(I) DEBTOR'S MOTION FOR ORDER:**
16) **(I) AUTHORIZING USE OF CASH**
17) **COLLATERAL PURSUANT TO**
18) **SECTION 363 OF THE BANKRUPTCY**
19) **CODE; AND (II) APPROVING**
20) **ADEQUATE PROTECTION [ECF 101];**
21) **AND**

)

) **(II) OBJECTION OF SIMON**
20) **PROPERTY GROUP AND**
21) **BROOKFIELD PROPERTIES RETAIL**
22) **TO DEBTOR'S SUBCHAPTER V**
23) **ELECTION OR, ALTERNATIVELY,**
24) **MOTION FOR APPOINTMENT OF AN**
25) **OFFICIAL COMMITTEE OF**
26) **UNSECURED CREDITORS [ECF 103]**

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) Hearing:

) Date: April 6, 2022

) Time: 10:00 a.m.

) Place: Courtroom 1539

) 255 East Temple Street

) Los Angeles, CA 90012

)

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) Hearing to be held in-person and by video-
) conference Government Zoom, see Court's
) website under "Telephonic Instructions" for
) more details:
) <https://www.cacb.uscourts.gov/judges/honor>
) able-sheri-bluebond
)
)

The Court, having read and considered that certain Stipulation to Extend Deadlines and Scheduling Regarding: (I) Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection [ECF 101], and (II) Objection of Simon Property Group and Brookfield Properties Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment of an Official Committee of Unsecured Creditors [ECF 103] (the "Stipulation") entered into, through counsel, by and between Escada America LLC, a Delaware limited liability company, (the "Debtor"), the debtor and debtor in possession in the above-captioned chapter 11, subchapter V bankruptcy case, on the one hand, and creditors Brookfield Properties Retail, Inc., Simon Property Group, Inc., and certain of their respective affiliates (collectively, the "Creditors"), on the other hand, the record in this case, the docket in this case, and good cause appearing, therefor,

HEREBY ORDERS AS FOLLOWS:

1. The Stipulation is approved.
2. The hearing on the Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection (the "Cash Collateral Motion") [ECF 101], on April 6, 2022, at 10:00 a.m., will be an interim hearing, with a further hearing set for April 27, 2022, at 10:00 a.m. (the "Further Hearing").
3. The Debtor's deadline to file a reply in support of the Cash Collateral Motion is extended to the date that is 7 days prior to the Further Hearing.
4. The hearing on the Objection of Simon Property Group and Brookfield Properties Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment of an

Official Committee of Unsecured Creditors (the “Election/Committee Motion”) [ECF 103], on April 6, 2022, at 10:00 a.m., is continued to and rescheduled concurrently with the Further Hearing.

5. The deadline for the Creditors to file a reply in support of the Election/Committee Motion is extended to the date that is 7 days prior to the Further Hearing.

6. At the status conference on April 6, 2022, the Debtor and Creditors may jointly request that the status conference be continued concurrently with the Further Hearing.

8 7. At the status conference on April 6, 2022, the Debtor and Creditors may jointly
9 request that the Court extend the Debtor's deadline to file a subchapter V plan under 11 U.S.C.
10 § 1189(b) from April 18, 2022, to May 2, 2022, without prejudice to further extension, and
11 without prejudice to the relief sought by the Election/Committee Motion.

12 | **SO ORDERED.**

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1 AGREED AS TO FORM:

2 Dated: March __, 2022

ESCADA AMERICA LLC

3 By: /s/ John-Patrick M. Fritz

4 JOHN-PATRICK M. FRITZ
5 LEVENE, NEALE, BENDER,
6 YOO & GOLUBCHIK L.L.P.
7 Attorneys for Chapter 11
Debtor and Debtor in Possession

8 Dated: March __, 2022

9 BROOKFIELD PROPERTIES RETAIL, INC., SIMON
10 PROPERTY GROUP, INC., AND CERTAIN OF THEIR
11 RESPECTIVE AFFILIATES

12 By: _____

13 IVAN M. GOLD
14 ALLEN MATKINS LECK GAMBLE MALLORY &
15 NATSIS LLP

16 Attorneys for Brookfield Properties Retail, Inc., Simon
17 Property Group, Inc., and Certain of their Respective
18 Affiliates

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 2818 La Cienega Avenue, Las Angeles, CA 90034

A true and correct copy of the foregoing document entitled **Notice Of Lodgment** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **March 29, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **March 29, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **March 29, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

<u>March 29, 2022</u>	Jason Klassi	<u>/s/ Jason Klassi</u>
Date	Type Name	Signature

2:22-bk-10266-BB Notice will be electronically mailed to:

Dustin P Branch on behalf of Creditor The Macerich Company
branchd@ballardspahr.com, carolod@ballardspahr.com;hubenb@ballardspahr.com

Michael J Darlow on behalf of Creditor Harris County Municipal Utility District #358
mdarlow@pbfc.com, tpope@pbfc.com

Eryk R Escobar on behalf of U.S. Trustee United States Trustee (LA)
eryk.r.escobar@usdoj.gov

John-Patrick M Fritz on behalf of Debtor Escada America, LLC
jpf@lnbyg.com, JPF.LNBYB@ecf.inforuptcy.com

William W Huckins on behalf of Creditor Brookfield Properties Retail, Inc.
whuckins@allenmatkins.com, clynch@allenmatkins.com;igold@allenmatkins.com

Gregory Kent Jones (TR)
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Michael S Kogan on behalf of Creditor Michael Kogan Law Firm, APC
mkogan@koganlawfirm.com

Kristen N Pate on behalf of Creditor Brookfield Properties Retail, Inc.
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Lindsey L Smith on behalf of Debtor Escada America, LLC
lls@lnbyg.com, lls@ecf.inforuptcy.com

Ronald M Tucker, Esq on behalf of Creditor SIMON PROPERTY GROUP INC
rtucker@simon.com, cmartin@simon.com;psummers@simon.com;Bankruptcy@simon.com

United States Trustee (LA)
ustregion16.la.ecf@usdoj.gov